

**UNITED STATES DISTRICT COURT
FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**UNITED STATES OF AMERICA,
Plaintiff**

v.

**2004 FERRARI 360 MODENO,
Defendant.**

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CIVIL ACTION NO. 4:10-cv-04474

CLAIM FOR SEIZED PROPERTY

COMES NOW, JOSETTE CLAUDE, Claimant, and files her claim to the following property:

2004 Ferrari 360 Modeno with vehicle identification number ZFFYU51A240137976.

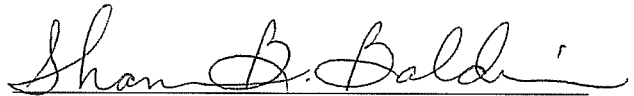
Said property was seized on June 18, 2010, in Houston, Texas.

The Claimant, Josette Claude, has an ownership interest in the property and is a co-owner, along with Evens Claude, of the property as she was the co-owner of the proceeds used to purchase the property. Further, the property was purchased with the intent of using it as an investment and she would also benefit from the future proceeds of the investment. She did not obtain the property in violation of Title 49, United States Code, Section 80302.

The Government has no interest in the property and any attempt by the Government to seize the property of the Claimant is premature and unripe. The Claimant has not been convicted of any violation and the property has not been traced into the Claimant's possession as a result of any violation of Title 49, United States Code, Section 80302.

It will result in great injustice if the Claimant's property is seized. The Claimant requests the Government to release the property.

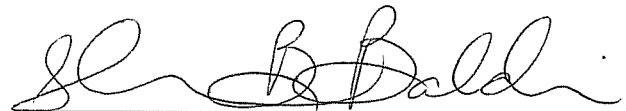
Respectfully submitted,



Shannon B. Baldwin
Attorney for Claimant
SBN 24034314, Fed ID# 24627
801 Congress St., Ste. 200
Houston, Texas 77002
Tel: 713-664-6800
Fax: 281-404-9021

CERTIFICATE OF SERVICE

I certify that a true and exact copy of the Claimant, JOSETTE CLAUDE's Claim to Property was electronically delivered to Albert Ratliff, Assistant United States Attorney on 21st day of December, 2010.



Shannon B. Baldwin

VERIFICATION

STATE OF PENNSYLVANIA

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CITY OF PHILADELPHIA

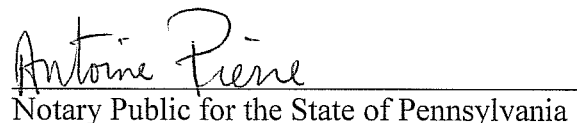
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"I, Josette Claude, co-own this property along with Evens Claude described as a 2004 Ferrari 360 Modena with vehicle identification number ZFFYU51A240137976, and declare under penalty of perjury, that the property seized in the matter to withy: a vehicle, 2004 Ferrari 360 Modena with vehicle identification number ZFFYU51A240137976, does in fact belong to me and Evens Claude and that I have a right to defend this action."


Josette Claude

SWORN TO AND SUBSCRIBED before me this 15th day of December, 2010.

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
ANTOINE PIERRE, Notary Public
City of Philadelphia, Phila. County
My Commission Expires January 28, 2012


Notary Public for the State of Pennsylvania